

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
Brownsville Division

STATE OF TEXAS, *et al.*

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*

Defendants

Case No. 1:14-cv-254

**MOTION SEEKING LEAVE OF COURT TO FILE  
BRIEF AND MEMORANDUM OF LAW IN OPPOSITION TO A STAY OF  
PRELIMINARY INJUNCTION BY AMICUS CURIAE SHERIFF JOE ARPAIO**

*Amicus Curiae* Joe Arpaio, elected Sheriff of Maricopa County, Arizona, hereby respectfully moves the Court for leave to file and have received the attached “Friend of the Court” Brief in support of the Plaintiff’s continuing request for a temporary injunction and in opposition to a stay thereof sought by the Defendants.

Defendants requested a stay of this Court’s temporary injunction pending appeal and have appealed this Court’s ruling of February 16, 2015, which ordered a temporary injunction.

Defendants once again lean significantly upon Sheriff Joe Arpaio’s case in the U.S. District Court of Appeals, *Arpaio v. Obama* now on appeal in the U.S. Circuit Court for the District of Columbia Circuit, Case No. 14-5325. The U.S. Government Defendants’ opposition brief is due on March 3, 2015, in Sheriff Arpaio’s appeal.

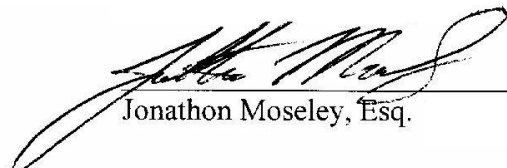
*Amicus Curiae* Sheriff Joe Arpaio, having previously filed a Friend of the Court Brief on the merits of the motion for preliminary injunction and standing, also now wishes to offer this additional brief and information in opposition to the Defendants’ request for a stay of the

injunction and in support of the preliminary injunction requested by the Plaintiffs.

Dated: February 23, 2015

Respectfully submitted,

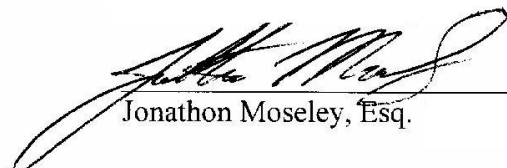
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*Pro Hac Vice Approved*

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing motion will be delivered electronically on February 23, 2015, to counsel for Plaintiffs and Defendants through the District's Electronic Case Filing system.

  
Jonathon Moseley, Esq.